

RETURN DATE: November 26, 2019 : SUPERIOR COURT
LISA CONROY, ET AL : J.D. OF WATERBURY
Vs. : AT WATERBURY
STATE OF CONNECTICUT, ET AL : OCTOBER 22, 2019

COMPLAINT

FIRST COUNT: (LISA CONROY v. STATE OF CONNECTICUT)
(§ 52-556)

1. At all times mentioned herein, **JOHN ARTHUR MCDONALD**, was an agent, servant, official and/or employee of the defendant, **STATE OF CONNECTICUT**, operating a motor vehicle owned and insured by the defendant, **STATE OF CONNECTICUT**.

2. On September 25, 2019, at approximately 7:27 p.m., the plaintiff, **LISA CONROY**, was the operator of a motor vehicle that was traveling in a northerly direction on Route 188 and had reached a point in the roadway at its intersection with Airport Road, both public streets or highways in Southbury, Connecticut.

3. At same time and place, **JOHN ARTHUR MCDONALD**, was the operator of a motor vehicle owned by the defendant, **STATE OF CONNECTICUT**, that was traveling in a westerly direction on Airport Road and had reached a point in the roadway at its intersection with Route 188.

4. At all times mentioned herein, westbound traffic on Airport Road was governed by a stop sign at its intersection with Route 188.

5. At the same time and place, while driving intoxicated, disregarding a stop sign, and driving at an excessive rate of speed, the motor vehicle operated by **JOHN ARTHUR MCDONALD**, suddenly and without warning collided with the motor vehicle operated by the plaintiff, thereby causing the plaintiff, **LISA CONROY**, to suffer the injuries and losses more fully set forth below.

6. The collision was caused by the negligence of the defendant, **STATE OF CONNECTICUT**, its agent, servant and/or employee, **JOHN ARTHUR MCDONALD**, in one or more of the following ways:

- a) He failed to keep a reasonable and proper lookout for other vehicles on the road;
- b) He failed to turn or swerve so as to avoid the collision;
- c) He failed to apply the brakes in time to avoid the collision;
- d) He failed to sound the horn or give a timely warning of the impending collision;
- e) He failed to keep the vehicle under proper control;
- f) He were inattentive in the operation of the vehicle;
- g) He operated the vehicle at a rate of speed greater than was reasonable, having due regard to the width, traffic, and use of the highway, road or

parking area, the intersection of streets and weather conditions, in violation of § 14-218a of the Connecticut General Statutes;

- h) He operated a motor vehicle while under the influence of intoxicating liquor, in violation of § 14-227(a)(1) of the Connecticut General Statutes;
- i) He operated a motor vehicle while he had an elevated blood alcohol content, in violation of § 14-227(a)(2) of the Connecticut General Statutes;
- j) He drove the vehicle in such proximity to another vehicle so as to obstruct or impede traffic, in violation of § 14-240(b) of the Connecticut General Statutes;
- k) He moved the vehicle which was stopped, standing or parked when such movement could not be made with reasonable safety and without interfering with other traffic, in violation of § 14-243(a) of the Connecticut General Statutes; and/or
- l) He failed to stop in obedience to a stop sign and/or failed to yield the right of way to the plaintiff's vehicle in violation of § 14-301(c) of the Connecticut General Statutes.

7. As a result of the negligence of the defendant, **STATE OF CONNECTICUT**, its agent, servant and/or employee, **JOHN ARTHUR MCDONALD**,

the plaintiff, **LISA CONROY**, suffered the following injuries, some or all of which may be permanent in nature:

- a) Head pain;
- b) Head lacerations;
- c) Headaches;
- d) Facial pain;
- e) Traumatic macular hole of right eye with associated pain and discomfort;
- f) Right eye pain;
- g) Loss of consciousness;
- h) Blurry vision;
- i) Anxiety;
- j) Dizziness;
- k) Back pain;
- l) Neck pain;
- m) Chest pain;
- n) Chest contusions;
- o) Breast contusions;
- p) Rib pain;
- q) Left shoulder pain;

- r) Bi-lateral arm pain;
- s) Bi-lateral arm contusions;
- t) Bi-lateral wrist pain;
- u) Bi-lateral wrist contusions;
- v) Bi-lateral wrist lacerations;
- w) Bi-lateral hand pain;
- x) Bi-lateral hand contusions;
- y) Abdominal pain;
- z) Abdominal contusions;
- aa) Bi-lateral hip pain;
- bb) Right hip contusions;
- cc) Bi-lateral leg pain;
- dd) Bi-lateral leg contusions;
- ee) Bi-lateral knee pain;
- ff) Bi-lateral knee contusions;
- gg) Bi-lateral knee lacerations;
- hh) Right foot pain;
- ii) Right foot contusions;
- jj) Right foot lacerations; and

kk) Pain and suffering, both mental and physical.

8. As a further result of the negligence of the defendant, **STATE OF CONNECTICUT**, its agent, servant and/or employee, **JOHN ARTHUR MCDONALD**, the plaintiff, **LISA CONROY**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

9. As a further result of the negligence of the defendant, **STATE OF CONNECTICUT**, its agent, servant and/or employee, **JOHN ARTHUR MCDONALD**, the plaintiff, **LISA CONROY**, was unable, and remains unable, to participate in and enjoy her usual activities.

10. This action is brought pursuant to § 52-556 of the Connecticut General Statutes.

SECOND COUNT: (LISA CONROY v. JOHN ARTHUR MCDONALD)
(Common Law Recklessness)

1. On September 25, 2019, at approximately 7:27 p.m., the plaintiff, **LISA CONROY**, was the operator of a motor vehicle that was traveling in a northerly direction on Route 188 and had reached a point in the roadway at its intersection with Airport Road, both public streets or highways in Southbury, Connecticut.

2. At same time and place, the defendant, **JOHN ARTHUR MCDONALD**, was the operator of a motor vehicle that was traveling in a westerly direction on Airport Road and had reached a point in the roadway at its intersection with Route 188.

3. At all times mentioned herein, westbound traffic on Airport Road was governed by a stop sign at its intersection with Route 188.

4. Sometime prior to 7:27 p.m., on September 25, 2019, the defendant, **JOHN ARTHUR MCDONALD**, consumed intoxicating liquors.

5. At the same time and place, while driving intoxicated, disregarding a stop sign, and driving at an excessive rate of speed, the motor vehicle operated by the defendant, **JOHN ARTHUR MCDONALD**, suddenly and without warning collided with the motor vehicle operated by the plaintiff, thereby causing the plaintiff, **LISA CONROY**, to suffer the injuries and losses more fully set forth below.

6. The collision was caused by the defendant, **JOHN ARTHUR MCDONALD**'s reckless, willful and/or wanton misconduct in one or more of the following ways:

- a) He operated the vehicle at a rate of speed greater than was reasonable, having due regard to the width, traffic, and use of the highway, road or parking area, the intersection of streets and weather conditions;

- b) He operated a motor vehicle while under the influence of intoxicating liquor;
- c) He operated a motor vehicle while he had an elevated blood alcohol content;
- d) He drove the vehicle in such proximity to another vehicle so as to obstruct or impede traffic;
- e) He moved the vehicle which was stopped, standing or parked when such movement could not be made with reasonable safety and without interfering with other traffic; and/or
- f) He failed to stop in obedience to a stop sign and/or failed to yield the right of way to the plaintiff's vehicle;

7. As a result of the defendant, **JOHN ARTHUR MCDONALD**'s reckless, willful and/or wanton misconduct, the plaintiff, **LISA CONROY**, suffered the following injuries, some or all of which may be permanent in nature:

- a) Head pain;
- b) Head lacerations;
- c) Headaches;
- d) Facial pain;
- e) Traumatic macular hole of right eye with associated pain and discomfort;
- f) Right eye pain;

- g) Loss of consciousness;
- h) Blurry vision;
- i) Anxiety;
- j) Dizziness;
- k) Back pain;
- l) Neck pain;
- m) Chest pain;
- n) Chest contusions;
- o) Breast contusions;
- p) Rib pain;
- q) Left shoulder pain;
- r) Bi-lateral arm pain;
- s) Bi-lateral arm contusions;
- t) Bi-lateral wrist pain;
- u) Bi-lateral wrist contusions;
- v) Bi-lateral wrist lacerations;
- w) Bi-lateral hand pain;
- x) Bi-lateral hand contusions;
- y) Abdominal pain;

- z) Abdominal contusions;
- aa) Bi-lateral hip pain;
- bb) Right hip contusions;
- cc) Bi-lateral leg pain;
- dd) Bi-lateral leg contusions;
- ee) Bi-lateral knee pain;
- ff) Bi-lateral knee contusions;
- gg) Bi-lateral knee lacerations;
- hh) Right foot pain;
- ii) Right foot contusions;
- jj) Right foot lacerations; and
- kk) Pain and suffering, both mental and physical.

8. As a further result of the defendant, **JOHN ARTHUR MCDONALD's** reckless, willful and/or wanton misconduct, the plaintiff, **LISA CONROY**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

9. As a further result of the defendant, **JOHN ARTHUR MCDONALD's** reckless, willful and/or wanton misconduct, the plaintiff, **LISA CONROY**, was unable, and remains unable, to participate in and enjoy her usual activities.

THIRD COUNT: **(LISA CONROY v. JOHN ARTHUR MCDONALD)**
 (Statutory Recklessness § 14-295)

1. On September 25, 2019, at approximately 7:27 p.m., the plaintiff, **LISA CONROY**, was the operator of a motor vehicle that was traveling in a northerly direction on Route 188 and had reached a point in the roadway at its intersection with Airport Road, both public streets or highways in Southbury, Connecticut.

2. At same time and place, the defendant, **JOHN ARTHUR MCDONALD**, was the operator of a motor vehicle that was traveling in a westerly direction on Airport Road and had reached a point in the roadway at its intersection with Route 188.

3. At all times mentioned herein, westbound traffic on Airport Road was governed by a stop sign at its intersection with Route 188.

4. Sometime prior to 7:27 p.m., on September 25, 2019, the defendant, **JOHN ARTHUR MCDONALD**, consumed intoxicating liquors.

5. At the same time and place, while driving intoxicated, disregarding a stop sign, and driving at an excessive rate of speed, the motor vehicle operated by the defendant, **JOHN ARTHUR MCDONALD**, suddenly and without warning collided with the motor

vehicle operated by the plaintiff, thereby causing the plaintiff, **LISA CONROY**, to suffer the injuries and losses more fully set forth below.

6. The collision was caused by the reckless disregard for the safety of others in violation of § 14-295 of the Connecticut General Statutes by the defendant, **JOHN ARTHUR MCDONALD**, in one or more of the following ways:

- a) He operated the vehicle at a rate of speed greater than is reasonable, having due regard to the width, traffic, and use of the highway, road or parking area, the intersection of streets and weather conditions, in violation of § 14-218a of the Connecticut General Statutes;
- b) He operated the motor vehicle in a reckless manner, in violation of § 14-222 of the Connecticut General Statutes, in that he knowingly drove while under the influence of intoxicating liquors or with an elevated blood alcohol content at a high rate of speed and disregarded a stop sign;
- c) He operated a motor vehicle while under the influence of intoxicating liquor, in violation of § 14-227(a)(1) of the Connecticut General Statutes; and/or
- d) He operated a motor vehicle while he had an elevated blood alcohol content, in violation of § 14-227(a)(2) of the Connecticut General Statutes.

7. The aforementioned violations were a substantial factor in causing **LISA CONROY**'s injuries and losses.

8. As a result of the reckless disregard for the safety of others in violation of § 14-295 of the Connecticut General Statutes by the defendant, **JOHN ARTHUR MCDONALD**, the plaintiff, **LISA CONROY**, suffered the following injuries, some or all of which may be permanent in nature:

- a) Head pain;
- b) Head lacerations;
- c) Headaches;
- d) Facial pain;
- e) Traumatic macular hole of right eye with associated pain and discomfort;
- f) Right eye pain;
- g) Loss of consciousness;
- h) Blurry vision;
- i) Anxiety;
- j) Dizziness;
- k) Back pain;
- l) Neck pain;
- m) Chest pain;

- n) Chest contusions;
- o) Breast contusions;
- p) Rib pain;
- q) Left shoulder pain;
- r) Bi-lateral arm pain;
- s) Bi-lateral arm contusions;
- t) Bi-lateral wrist pain;
- u) Bi-lateral wrist contusions;
- v) Bi-lateral wrist lacerations;
- w) Bi-lateral hand pain;
- x) Bi-lateral hand contusions;
- y) Abdominal pain;
- z) Abdominal contusions;
- aa) Bi-lateral hip pain;
- bb) Right hip contusions;
- cc) Bi-lateral leg pain;
- dd) Bi-lateral leg contusions;
- ee) Bi-lateral knee pain;
- ff) Bi-lateral knee contusions;

- gg) Bi-lateral knee lacerations;
- hh) Right foot pain;
- ii) Right foot contusions;
- jj) Right foot lacerations; and
- kk) Pain and suffering, both mental and physical.

9. As a further result of the reckless disregard for the safety of others in violation of § 14-295 of the Connecticut General Statutes by the defendant, **JOHN ARTHUR MCDONALD**, the plaintiff, **LISA CONROY**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

10. As a further result of the reckless disregard for the safety of others in violation of § 14-295 of the Connecticut General Statutes by the defendant, **JOHN ARTHUR MCDONALD**, the plaintiff, **LISA CONROY**, was unable, and remains unable, to participate in and enjoy her usual activities.

FOURTH COUNT:

**(LISA CONROY v. THOMAS JOSEPH SOBOCINSKI
and JASON SOBOCINSKI D/B/A BLACK HOG
BREWING A/K/A BLACK HOG BREWING LLC)
(Dram Shop)**

1. On September 25, 2019 and at all times mentioned herein, the defendant, **THOMAS JOSEPH SOBOCINSKI and/or JASON SOBOCINSKI**, was the permittee

and the defendant, **BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, was the backer of and was doing business as **BLACK HOG BREWING LLC** an establishment in which alcoholic beverages were sold, located at 115 Hurley Road, Building 9A, in Oxford, Connecticut.

2. On September 25, 2019, **JOHN ARTHUR MCDONALD** was a patron at **BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, where alcoholic beverages were served.

3. Agents, servants and/or employees of **BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC** served alcoholic beverages to **JOHN ARTHUR MCDONALD** while he was visibly intoxicated, in violation of § 30-102 of the Connecticut General Statutes.

4. On September 25, 2019, at approximately 7:27 p.m., the plaintiff, **LISA CONROY**, was the operator of a motor vehicle that was traveling in a northerly direction on Route 188 and had reached a point in the roadway at its intersection with Airport Road, both public streets or highways in Southbury, Connecticut.

5. At same time and place, **JOHN ARTHUR MCDONALD**, was the operator of a motor vehicle that was traveling in a westerly direction on Airport Road and had reached a point in the roadway at its intersection with Route 188.

6. At all times mentioned herein, westbound traffic on Airport Road was governed by a stop sign at its intersection with Route 188.

7. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees, the motor vehicle operated by **JOHN ARTHUR MCDONALD**, suddenly and without warning collided with the motor vehicle operated by the plaintiff, thereby causing the plaintiff, **LISA CONROY**, to suffer the injuries and losses more fully set forth below.

8. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees, the plaintiff, **LISA CONROY**, suffered the following injuries, some or all of which may be permanent in nature:

- a) Head pain;
- b) Head lacerations;
- c) Headaches;
- d) Facial pain;
- e) Traumatic macular hole of right eye with associated pain and discomfort;

- f) Right eye pain;
- g) Loss of consciousness;
- h) Blurry vision;
- i) Anxiety;
- j) Dizziness;
- k) Back pain;
- l) Neck pain;
- m) Chest pain;
- n) Chest contusions;
- o) Breast contusions;
- p) Rib pain;
- q) Left shoulder pain;
- r) Bi-lateral arm pain;
- s) Bi-lateral arm contusions;
- t) Bi-lateral wrist pain;
- u) Bi-lateral wrist contusions;
- v) Bi-lateral wrist lacerations;
- w) Bi-lateral hand pain;
- x) Bi-lateral hand contusions;

- y) Abdominal pain;
- z) Abdominal contusions;
- aa) Bi-lateral hip pain;
- bb) Right hip contusions;
- cc) Bi-lateral leg pain;
- dd) Bi-lateral leg contusions;
- ee) Bi-lateral knee pain;
- ff) Bi-lateral knee contusions;
- gg) Bi-lateral knee lacerations;
- hh) Right foot pain;
- ii) Right foot contusions;
- jj) Right foot lacerations; and
- kk) Pain and suffering, both mental and physical.

9. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees, the plaintiff, **LISA CONROY**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

10. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees, the plaintiff, **LISA CONROY**, was unable, and remains unable, to participate in and enjoy her usual activities.

11. This action is brought pursuant to § 30-102 of the Connecticut General Statutes.

12. In compliance with § 30-102 of the Connecticut General Statutes, the plaintiff has notified the defendant of her intention to bring an action under this section. (Notice is attached hereto as Exhibit A).

FIFTH COUNT: **(LISA CONROY v. THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC)**
(Common Law Recklessness)

1. On September 25, 2019 and at all times mentioned herein, the defendant, **THOMAS JOSEPH SOBOCINSKI and/or JASON SOBOCINSKI**, was the permittee and the defendant, **BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, was the backer of and was doing business as **BLACK HOG BREWING LLC** an establishment in which alcoholic beverages were sold, located at 115 Hurley Road, Building 9A, in Oxford, Connecticut.

2. On September 25, 2019, **JOHN ARTHUR MCDONALD** was a patron at **BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, where alcoholic beverages were served.

3. Agents, servants and/or employees of **BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC** served alcoholic beverages to **JOHN ARTHUR MCDONALD** while he was visibly intoxicated, in violation of § 30-102 of the Connecticut General Statutes.

4. On September 25, 2019, at approximately 7:27 p.m., the plaintiff, **LISA CONROY**, was the operator of a motor vehicle that was traveling in a northerly direction on Route 188 and had reached a point in the roadway at its intersection with Airport Road, both public streets or highways in Southbury, Connecticut.

5. At same time and place, **JOHN ARTHUR MCDONALD**, was the operator of a motor vehicle that was traveling in a westerly direction on Airport Road and had reached a point in the roadway at its intersection with Route 188.

6. At all times mentioned herein, westbound traffic on Airport Road was governed by a stop sign at its intersection with Route 188.

7. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants

and/or employees, the motor vehicle operated by **JOHN ARTHUR MCDONALD**, suddenly and without warning collided with the motor vehicle operated by the plaintiff, thereby causing the plaintiff, **LISA CONROY**, to suffer the injuries and losses more fully set forth below.

8. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees, the plaintiff, **LISA CONROY**, suffered the following injuries, some or all of which may be permanent in nature:

- a) Head pain;
- b) Head lacerations;
- c) Headaches;
- d) Facial pain;
- e) Traumatic macular hole of right eye with associated pain and discomfort;
- f) Right eye pain;
- g) Loss of consciousness;
- h) Blurry vision;
- i) Anxiety;
- j) Dizziness;

- k) Back pain;
- l) Neck pain;
- m) Chest pain;
- n) Chest contusions;
- o) Breast contusions;
- p) Rib pain;
- q) Left shoulder pain;
- r) Bi-lateral arm pain;
- s) Bi-lateral arm contusions;
- t) Bi-lateral wrist pain;
- u) Bi-lateral wrist contusions;
- v) Bi-lateral wrist lacerations;
- w) Bi-lateral hand pain;
- x) Bi-lateral hand contusions;
- y) Abdominal pain;
- z) Abdominal contusions;
- aa) Bi-lateral hip pain;
- bb) Right hip contusions;
- cc) Bi-lateral leg pain;

- dd) Bi-lateral leg contusions;
- ee) Bi-lateral knee pain;
- ff) Bi-lateral knee contusions;
- gg) Bi-lateral knee lacerations;
- hh) Right foot pain;
- ii) Right foot contusions;
- jj) Right foot lacerations; and
- kk) Pain and suffering, both mental and physical.

9. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees, the plaintiff, **LISA CONROY**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

10. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees, the plaintiff, **LISA CONROY**, was unable, and remains unable, to participate in and enjoy her usual activities.

11. The collision and the damages mentioned above were caused by the reckless, willful and/or wanton misconduct of the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees in one or more of the following ways:

- a) They maintained an alcohol service policy within the bar in which intoxicated persons would not be refused service;
- b) They served numerous drinks to **JOHN ARTHUR MCDONALD**, which caused his intoxication, when the defendants knew, or should have known, that **JOHN ARTHUR MCDONALD** would operate a motor vehicle upon leaving the defendants' premises;
- c) They chose not to cut off **JOHN ARTHUR MCDONALD** when they knew he was intoxicated and likely to drive a motor vehicle on the roads of this State with other drivers;
- d) They allowed **JOHN ARTHUR MCDONALD** to operate a motor vehicle upon leaving the bar when they knew that **JOHN ARTHUR MCDONALD** was in an intoxicated state; and/or

- e) They continued to supply alcohol to **JOHN ARTHUR MCDONALD** who lacked the capacity to fully understand the risks associated with intoxication due to his propensity to drink alcohol excessively.

SIXTH COUNT: **(MADISON CONROY v. STATE OF CONNECTICUT)**
 (§ 52-556)

1. At all times mentioned herein, **JOHN ARTHUR MCDONALD**, was an agent, servant, official and/or employee of the defendant, **STATE OF CONNECTICUT**, operating a motor vehicle owned and insured by the defendant, **STATE OF CONNECTICUT**.

2. On September 25, 2019, at approximately 7:27 p.m., the plaintiff, **MADISON CONROY**, was a passenger in a motor vehicle operated by LISA CONROY, that was traveling in a northerly direction on Route 188 and had reached a point in the roadway at its intersection with Airport Road, both public streets or highways in Southbury, Connecticut.

3. At same time and place, **JOHN ARTHUR MCDONALD**, was the operator of a motor vehicle owned by the defendant, **STATE OF CONNECTICUT**, that was traveling in a westerly direction on Airport Road and had reached a point in the roadway at its intersection with Route 188.

4. At all times mentioned herein, westbound traffic on Airport Road was governed by a stop sign at its intersection with Route 188.

5. At the same time and place, while driving intoxicated, disregarding a stop sign, and driving at an excessive rate of speed, the motor vehicle operated by **JOHN ARTHUR MCDONALD** suddenly and without warning collided with the motor vehicle occupied by the plaintiff, thereby causing the plaintiff, **MADISON CONROY**, to suffer the injuries and losses more fully set forth below.

6. The collision was caused by the negligence of the defendant, **STATE OF CONNECTICUT**, its agent, servant and/or employee, **JOHN ARTHUR MCDONALD**, in one or more of the following ways:

- a) He failed to keep a reasonable and proper lookout for other vehicles on the road;
- b) He failed to turn or swerve so as to avoid the collision;
- c) He failed to apply the brakes in time to avoid the collision;
- d) He failed to sound the horn or give a timely warning of the impending collision;
- e) He failed to keep the vehicle under proper control;
- f) He were inattentive in the operation of the vehicle;
- g) He operated the vehicle at a rate of speed greater than was reasonable, having due regard to the width, traffic, and use of the highway, road or

parking area, the intersection of streets and weather conditions, in violation of § 14-218a of the Connecticut General Statutes;

- h) He operated a motor vehicle while under the influence of intoxicating liquor, in violation of § 14-227(a)(1) of the Connecticut General Statutes;
- i) He operated a motor vehicle while he had an elevated blood alcohol content, in violation of § 14-227(a)(2) of the Connecticut General Statutes;
- j) He drove the vehicle in such proximity to another vehicle so as to obstruct or impede traffic, in violation of § 14-240(b) of the Connecticut General Statutes;
- k) He moved the vehicle which was stopped, standing or parked when such movement could not be made with reasonable safety and without interfering with other traffic, in violation of § 14-243(a) of the Connecticut General Statutes; and/or
- l) He failed to stop in obedience to a stop sign and/or failed to yield the right of way to the plaintiff's vehicle in violation of § 14-301(c) of the Connecticut General Statutes.

7. As a result of the negligence of the defendant, **STATE OF CONNECTICUT**, its agent, servant and/or employee, **JOHN ARTHUR MCDONALD**,

the plaintiff, **MADISON CONROY**, suffered the following injuries, some or all of which may be permanent in nature:

- a) Head pain;
- b) Head contusion;
- c) Headaches;
- d) Concussion;
- e) Post-concussive syndrome;
- f) Loss of consciousness;
- g) Tinnitus;
- h) Chin pain;
- i) Chin contusions;
- j) Anxiety;
- k) Neck pain;
- l) Back pain;
- m) Sprained left collarbone with associated pain and discomfort;
- n) Left collarbone pain;
- o) Left wrist fracture with associated pain and discomfort;
- p) Left wrist pain;
- q) Left hand pain;

- r) Bi-lateral hip pain;
- s) Bi-lateral hip contusions;
- t) Bi-lateral leg pain;
- u) Bi-lateral leg contusions;
- v) Bi-lateral leg lacerations;
- w) Bi-lateral knee pain;
- x) Bi-lateral knee contusions; and
- y) Pain and suffering, both mental and physical.

8. As a further result of the negligence of the defendant, **STATE OF CONNECTICUT**, its agent, servant and/or employee, **JOHN ARTHUR MCDONALD**, the plaintiff, **MADISON CONROY**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

9. As a further result of the negligence of the defendant, **STATE OF CONNECTICUT**, its agent, servant and/or employee, **JOHN ARTHUR MCDONALD**, the plaintiff, **MADISON CONROY**, was unable, and remains unable, to participate in and enjoy her usual activities.

10. This action is brought pursuant to § 52-556 of the Connecticut General Statutes.

SEVENTH COUNT:(MADISON CONROY v. JOHN ARTHUR MCDONALD)
(Common Law Recklessness)

1. On September 25, 2019, at approximately 7:27 p.m., the plaintiff, **MADISON CONROY**, was a passenger in a motor vehicle operated by LISA CONROY, that was traveling in a northerly direction on Route 188 and had reached a point in the roadway at its intersection with Airport Road, both public streets or highways in Southbury, Connecticut.

2. At same time and place, the defendant, **JOHN ARTHUR MCDONALD**, was the operator of a motor vehicle that was traveling in a westerly direction on Airport Road and had reached a point in the roadway at its intersection with Route 188.

3. At all times mentioned herein, westbound traffic on Airport Road was governed by a stop sign at its intersection with Route 188.

4. Sometime prior to 7:27 p.m., on September 25, 2019, the defendant, **JOHN ARTHUR MCDONALD**, consumed intoxicating liquors.

5. At the same time and place, while driving intoxicated, disregarding a stop sign, and driving at an excessive rate of speed, the motor vehicle operated by the defendant, **JOHN ARTHUR MCDONALD**, suddenly and without warning collided with the motor vehicle occupied by the plaintiff, thereby causing the plaintiff, **MADISON CONROY**, to suffer the injuries and losses more fully set forth below.

6. The collision was caused by the defendant, **JOHN ARTHUR MCDONALD**'s reckless, willful and/or wanton misconduct in one or more of the following ways:

- a) He operated the vehicle at a rate of speed greater than was reasonable, having due regard to the width, traffic, and use of the highway, road or parking area, the intersection of streets and weather conditions;
- b) He operated a motor vehicle while under the influence of intoxicating liquor;
- c) He operated a motor vehicle while he had an elevated blood alcohol content;
- d) He drove the vehicle in such proximity to another vehicle so as to obstruct or impede traffic;
- e) He moved the vehicle which was stopped, standing or parked when such movement could not be made with reasonable safety and without interfering with other traffic; and/or
- f) He failed to stop in obedience to a stop sign and/or failed to yield the right of way to the plaintiff's vehicle.

7. As a result of the defendant, **JOHN ARTHUR MCDONALD**'s reckless, willful and/or wanton misconduct, the plaintiff, **MADISON CONROY**, suffered the following injuries, some or all of which may be permanent in nature:

- a) Head pain;
- b) Head contusion;
- c) Headaches;
- d) Concussion;
- e) Post-concussive syndrome;
- f) Loss of consciousness;
- g) Tinnitus;
- h) Chin pain;
- i) Chin contusions;
- j) Anxiety;
- k) Neck pain;
- l) Back pain;
- m) Sprained left collarbone with associated pain and discomfort;
- n) Left collarbone pain;
- o) Left wrist fracture with associated pain and discomfort;
- p) Left wrist pain;
- q) Left hand pain;
- r) Bi-lateral hip pain;
- s) Bi-lateral hip contusions;

- t) Bi-lateral leg pain;
- u) Bi-lateral leg contusions;
- v) Bi-lateral leg lacerations;
- w) Bi-lateral knee pain;
- x) Bi-lateral knee contusions; and
- y) Pain and suffering, both mental and physical.

8. As a further result of the defendant, **JOHN ARTHUR MCDONALD's** reckless, willful and/or wanton misconduct, the plaintiff, **MADISON CONROY**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

9. As a further result of the defendant, **JOHN ARTHUR MCDONALD's** reckless, willful and/or wanton misconduct, the plaintiff, **MADISON CONROY**, was unable, and remains unable, to participate in and enjoy her usual activities.

EIGHTH COUNT: (MADISON CONROY v. JOHN ARTHUR MCDONALD)
(Statutory Recklessness § 14-295)

1. On September 25, 2019, at approximately 7:27 p.m., the plaintiff, **MADISON CONROY**, was a passenger in a motor vehicle operated by LISA CONROY, that was traveling in a northerly direction on Route 188 and had reached a point in the

roadway at its intersection with Airport Road, both public streets or highways in Southbury, Connecticut.

2. At same time and place, the defendant, **JOHN ARTHUR MCDONALD**, was the operator of a motor vehicle that was traveling in a westerly direction on Airport Road and had reached a point in the roadway at its intersection with Route 188.

3. At all times mentioned herein, westbound traffic on Airport Road was governed by a stop sign at its intersection with Route 188.

4. Sometime prior to 7:27 p.m., on September 25, 2019, the defendant, **JOHN ARTHUR MCDONALD**, consumed intoxicating liquors.

5. At the same time and place, while driving intoxicated, disregarding a stop sign, and driving at an excessive rate of speed, the motor vehicle operated by the defendant, **JOHN ARTHUR MCDONALD**, suddenly and without warning collided with the motor vehicle occupied by the plaintiff, thereby causing the plaintiff, **MADISON CONROY**, to suffer the injuries and losses more fully set forth below.

6. The collision was caused by the reckless disregard for the safety of others in violation of § 14-295 of the Connecticut General Statutes by the defendant, **JOHN ARTHUR MCDONALD**, in one or more of the following ways:

- a) He operated the vehicle at a rate of speed greater than is reasonable, having due regard to the width, traffic, and use of the highway, road or parking

area, the intersection of streets and weather conditions, in violation of § 14-218a of the Connecticut General Statutes;

- b) He operated the motor vehicle in a reckless manner, in violation of § 14-222 of the Connecticut General Statutes, in that he knowingly drove while under the influence of intoxicating liquors or with an elevated blood alcohol content at a high rate of speed and disregarded a stop sign;
- c) He operated a motor vehicle while under the influence of intoxicating liquor, in violation of § 14-227(a)(1) of the Connecticut General Statutes; and/or
- d) He operated a motor vehicle while he had an elevated blood alcohol content, in violation of § 14-227(a)(2) of the Connecticut General Statutes.

7. The aforementioned violations were a substantial factor in causing **MADISON CONROY's** injuries and losses.

8. As a result of the reckless disregard for the safety of others in violation of § 14-295 of the Connecticut General Statutes by the defendant, **JOHN ARTHUR MCDONALD**, the plaintiff, **MADISON CONROY**, suffered the following injuries, some or all of which may be permanent in nature:

- a) Head pain;
- b) Head contusion;

- c) Headaches;
- d) Concussion;
- e) Post-concussive syndrome;
- f) Loss of consciousness;
- g) Tinnitus;
- h) Chin pain;
- i) Chin contusions;
- j) Anxiety;
- k) Neck pain;
- l) Back pain;
- m) Sprained left collarbone with associated pain and discomfort;
- n) Left collarbone pain;
- o) Left wrist fracture with associated pain and discomfort;
- p) Left wrist pain;
- q) Left hand pain;
- r) Bi-lateral hip pain;
- s) Bi-lateral hip contusions;
- t) Bi-lateral leg pain;
- u) Bi-lateral leg contusions;

- v) Bi-lateral leg lacerations;
- w) Bi-lateral knee pain;
- x) Bi-lateral knee contusions; and
- y) Pain and suffering, both mental and physical.

9. As a further result of the reckless disregard for the safety of others in violation of § 14-295 of the Connecticut General Statutes by the defendant, **JOHN ARTHUR MCDONALD**, the plaintiff, **MADISON CONROY**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

10. As a further result of the reckless disregard for the safety of others in violation of § 14-295 of the Connecticut General Statutes by the defendant, **JOHN ARTHUR MCDONALD**, the plaintiff, **MADISON CONROY**, was unable, and remains unable, to participate in and enjoy her usual activities.

NINTH COUNT: (MADISON CONROY v. THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC)
(Dram Shop)

1. On September 25, 2019 and at all times mentioned herein, the defendant, **THOMAS JOSEPH SOBOCINSKI and/or JASON SOBOCINSKI**, was the permittee and the defendant, **BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**,

was the backer of and was doing business as **BLACK HOG BREWING LLC** an establishment in which alcoholic beverages were sold, located at 115 Hurley Road, Building 9A, in Oxford, Connecticut.

2. On September 25, 2019, **JOHN ARTHUR MCDONALD** was a patron at **BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, where alcoholic beverages were served.

3. Agents, servants and/or employees of **BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC** served alcoholic beverages to **JOHN ARTHUR MCDONALD** while he was visibly intoxicated, in violation of § 30-102 of the Connecticut General Statutes.

4. On September 25, 2019, at approximately 7:27 p.m., the plaintiff, **MADISON CONROY**, was a passenger in a motor vehicle operated by **LISA CONROY**, that was traveling in a northerly direction on Route 188 and had reached a point in the roadway at its intersection with Airport Road, both public streets or highways in Southbury, Connecticut.

5. At same time and place, **JOHN ARTHUR MCDONALD**, was the operator of a motor vehicle that was traveling in a westerly direction on Airport Road and had reached a point in the roadway at its intersection with Route 188.

6. At all times mentioned herein, westbound traffic on Airport Road was governed by a stop sign at its intersection with Route 188.

7. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees, the motor vehicle operated by **JOHN ARTHUR MCDONALD**, suddenly and without warning collided with the motor vehicle occupied by the plaintiff, thereby causing the plaintiff, **MADISON CONROY**, to suffer the injuries and losses more fully set forth below.

8. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees, the plaintiff, **MADISON CONROY**, suffered the following injuries, some or all of which may be permanent in nature:

- a) Head pain;
- b) Head contusion;
- c) Headaches;
- d) Concussion;
- e) Post-concussive syndrome;

- f) Loss of consciousness;
- g) Tinnitus;
- h) Chin pain;
- i) Chin contusions;
- j) Anxiety;
- k) Neck pain;
- l) Back pain;
- m) Sprained left collarbone with associated pain and discomfort;
- n) Left collarbone pain;
- o) Left wrist fracture with associated pain and discomfort;
- p) Left wrist pain;
- q) Left hand pain;
- r) Bi-lateral hip pain;
- s) Bi-lateral hip contusions;
- t) Bi-lateral leg pain;
- u) Bi-lateral leg contusions;
- v) Bi-lateral leg lacerations;
- w) Bi-lateral knee pain;
- x) Bi-lateral knee contusions; and

y) Pain and suffering, both mental and physical.

9. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees, the plaintiff, **MADISON CONROY**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

10. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees, the plaintiff, **MADISON CONROY**, was unable, and remains unable, to participate in and enjoy her usual activities.

11. This action is brought pursuant to § 30-102 of the Connecticut General Statutes.

12. In compliance with § 30-102 of the Connecticut General Statutes, the plaintiff has notified the defendant of her intention to bring an action under this section. (Notice is attached hereto as Exhibit A).

**TENTH COUNT: (MADISON CONROY v. THOMAS JOSEPH SOBOCINSKI
and JASON SOBOCINSKI D/B/A BLACK HOG BREWING
A/K/A BLACK HOG BREWING LLC)
(Common Law Recklessness)**

1. On September 25, 2019 and at all times mentioned herein, the defendant, **THOMAS JOSEPH SOBOCINSKI** and/or **JASON SOBOCINSKI**, was the permittee and the defendant, **BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, was the backer of and was doing business as **BLACK HOG BREWING LLC** an establishment in which alcoholic beverages were sold, located at 115 Hurley Road, Building 9A, in Oxford, Connecticut.

2. On September 25, 2019, **JOHN ARTHUR MCDONALD** was a patron at **BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, where alcoholic beverages were served.

3. Agents, servants and/or employees of **BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC** served alcoholic beverages to **JOHN ARTHUR MCDONALD** while he was visibly intoxicated, in violation of § 30-102 of the Connecticut General Statutes.

4. On September 25, 2019, at approximately 7:27 p.m., the plaintiff, **MADISON CONROY**, was a passenger in a motor vehicle operated by **LISA CONROY**, that was traveling in a northerly direction on Route 188 and had reached a point in the

roadway at its intersection with Airport Road, both public streets or highways in Southbury, Connecticut.

5. At same time and place, **JOHN ARTHUR MCDONALD**, was the operator of a motor vehicle that was traveling in a westerly direction on Airport Road and had reached a point in the roadway at its intersection with Route 188.

6. At all times mentioned herein, westbound traffic on Airport Road was governed by a stop sign at its intersection with Route 188.

7. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees, the motor vehicle operated by **JOHN ARTHUR MCDONALD**, suddenly and without warning collided with the motor vehicle occupied by the plaintiff, thereby causing the plaintiff, **MADISON CONROY**, to suffer the injuries and losses more fully set forth below.

8. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees, the plaintiff, **MADISON CONROY**, suffered the following injuries, some or all of which may be permanent in nature:

- a) Head pain;
- b) Head contusion;
- c) Headaches;
- d) Concussion;
- e) Post-concussive syndrome;
- f) Loss of consciousness;
- g) Tinnitus;
- h) Chin pain;
- i) Chin contusions;
- j) Anxiety;
- k) Neck pain;
- l) Back pain;
- m) Sprained left collarbone with associated pain and discomfort;
- n) Left collarbone pain;
- o) Left wrist fracture with associated pain and discomfort;
- p) Left wrist pain;
- q) Left hand pain;
- r) Bi-lateral hip pain;
- s) Bi-lateral hip contusions;

- t) Bi-lateral leg pain;
- u) Bi-lateral leg contusions;
- v) Bi-lateral leg lacerations;
- w) Bi-lateral knee pain;
- x) Bi-lateral knee contusions; and
- y) Pain and suffering, both mental and physical.

9. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees, the plaintiff, **MADISON CONROY**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

10. As a result of the sale of alcohol to **JOHN ARTHUR MCDONALD** by the defendant, **THOMAS JOSEPH SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC**, its agents, servants and/or employees, the plaintiff, **MADISON CONROY**, was unable, and remains unable, to participate in and enjoy her usual activities.

11. The collision and the damages mentioned above were caused by the reckless, willful and/or wanton misconduct of the defendant, **THOMAS JOSEPH**

SOBOCINSKI and JASON SOBOCINSKI D/B/A BLACK HOG BREWING A/K/A BLACK HOG BREWING LLC, its agents, servants and/or employees in one or more of the following ways:

- a) They maintained an alcohol service policy within the bar in which intoxicated persons would not be refused service;
- b) They served numerous drinks to **JOHN ARTHUR MCDONALD**, which caused his intoxication, when the defendants knew, or should have known, that **JOHN ARTHUR MCDONALD** would operate a motor vehicle upon leaving the defendants' premises;
- c) They chose not to cut off **JOHN ARTHUR MCDONALD** when they knew he was intoxicated and likely to drive a motor vehicle on the roads of this State with other drivers;
- d) They allowed **JOHN ARTHUR MCDONALD** to operate a motor vehicle upon leaving the bar when they knew that **JOHN ARTHUR MCDONALD** was in an intoxicated state; and/or
- e) They continued to supply alcohol to **JOHN ARTHUR MCDONALD** who lacked the capacity to fully understand the risks associated with intoxication due to his propensity to drink alcohol excessively.

WHEREFORE, the plaintiff claims:

1. Money damages as to all Counts;
2. Punitive and exemplary damages as prescribed by law as to the Second Count, Fifth Count, Seventh Count, and Tenth Count;
3. Double or treble damages pursuant to Connecticut General Statutes § 14-295 as to the Third Count and Eighth Count.

THE PLAINTIFFS,
LISA CONROY
MADISON CONROY

By 

Garrett M. Moore, Sr.
Moore, O'Brien & Foti
891 Straits Turnpike
Middlebury, CT 06762
Phone: (203) 272-5881
Juris No.: 408519
Their Attorneys

RETURN DATE: November 26, 2019 : SUPERIOR COURT
LISA CONROY, ET AL : J.D. OF WATERBURY
Vs. : AT WATERBURY
STATE OF CONNECTICUT, ET AL : OCTOBER 26, 2019

STATEMENT OF AMOUNT IN DEMAND

The amount of money damages claimed is greater than Fifteen Thousand Dollars (\$15,000.00), exclusive of interest and costs.

THE PLAINTIFFS,
LISA CONROY
MADISON CONROY

By 

Garrett M. Moore, Sr.
Moore, O'Brien & Foti
891 Straits Turnpike
Middlebury, CT 06762
Phone: (203) 272-5881
Juris No.: 408519
Their Attorneys

EXHIBIT A

**NOTICE PURSUANT TO § 30-102 OF THE CONNECTICUT GENERAL
STATUTES OF INTENTION TO INSTITUTE A LAWSUIT AND CLAIM MONEY
DAMAGES**

**NOTICE GIVEN TO: Thomas Joseph Sobocinski d/b/a
Black Hog Brewing a/k/a Black Hog Brewing LLC**

Business Address: 115 Hurley Road, Building 9A
Oxford, CT 06478

Thomas Joseph Sobocinski

Business Address (1): 115 Hurley Road, Building 9A
Oxford, CT 06478

Business Address (2): 93 Whitney Avenue
New Haven, CT 06510

Business Address (3): 25 Brinsmade Road
Hamden, CT 06514

Residence Address (1): 141 Greenwich Avenue
New Haven, CT 06519

Residence Address (2): 25 Brinsmade Road
Hamden, CT 06514

Jason Sobocinski

Business Address: 115 Hurley Road, Building 9A
Oxford, CT 06478

Residence Address: 153 Dessa Drive
Hamden, CT 06517

Black Hog Brewing LLC: Backer

Business Address (1): 115 Hurley Road, Building 9A
Oxford, CT 06478

Mailing Address (2): 115 Hurley Road, Building 9A
Oxford, CT 06478

Agent for Service:

Thomas Joseph Sobocinski

Business Address (1): 115 Hurley Road, Building 9A
Oxford, CT 06478

Business Address (2): 93 Whitney Avenue
New Haven, CT 06510

Business Address (3): 25 Brinsmade Road
Hamden, CT 06514

Residence Address (1): 141 Greenwich Avenue
New Haven, CT 06519

Residence Address (2): 25 Brinsmade Road
Hamden, CT 06514

Thomas Joseph Sobocinski: Permittee

Business Address (1): 115 Hurley Road, Building 9A
Oxford, CT 06478

Business Address (2): 93 Whitney Avenue
New Haven, CT 06510

Business Address (3): 25 Brinsmade Road
Hamden, CT 06514

Residence Address (1): 141 Greenwich Avenue
New Haven, CT 06519

Residence Address (2): 25 Brinsmade Road
Hamden, CT 06514

Thomas Joseph Sobocinski: Limited Liability Member

Business Address (1): 115 Hurley Road, Building 9A
Oxford, CT 06478

Business Address (2): 93 Whitney Avenue
New Haven, CT 06510

Business Address (3): 25 Brinsmade Road
Hamden, CT 06514

Residence Address (1): 141 Greenwich Avenue
New Haven, CT 06519

Residence Address (2): 25 Brinsmade Road
Hamden, CT 06514

Tyler R Jones: Limited Liability Member

Business Address: 93 Whitney Avenue
New Haven, CT 06510

Residence Address: 51 Spring Road
North Haven, CT 06473

Kelly Ann Sobocinski: Limited Liability Member

Business Address: 93 Whitney Avenue
New Haven, CT 06510

Residence Address: 153 Dessa Drive
Hamden, CT 06517

ON BEHALF OF: Madison R. Conroy (Age 19)
509 Shadduck Road
Middlebury, CT 06762
DOB: 07/20/2000

PLEASE TAKE NOTICE THAT:

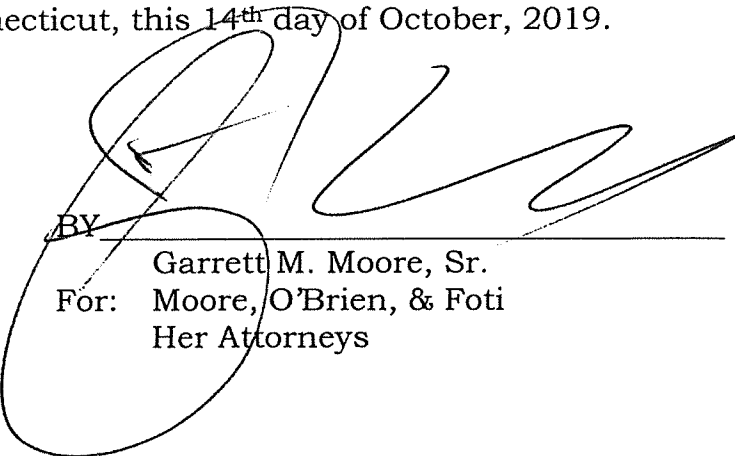
On or about September 25, 2019, you, your servants, agents, and/or employees, did for a valuable consideration, serve and/or furnish intoxicating liquors to John Arthur McDonald (DOB 10/13/1982), of 1111 Country Club Road in Middletown, Connecticut, while he was in an intoxicated state. Said sale of intoxicating liquors took place while John Arthur McDonald, was at Thomas Joseph Sobocinski d/b/a Black Hog Brewing a/k/a Black Hog Brewing LLC, 115 Hurley Road, Building 9A Oxford, CT 06478 between the hours of 8:00 a.m. and 7:27 p.m. on September 25, 2019. As a result of said intoxication and the sale of intoxicating liquors to John Arthur McDonald by you, your servants, agents, and/or employees on that date, the automobile John Arthur McDonald was operating failed to stop at a stop sign and suddenly and without warning entered intersection and struck a motor vehicle Madison R. Conroy was in causing her vehicle to be pushed several feet across oncoming lanes of traffic and into the woods, thereby causing Madison R. Conroy to sustain and suffer injuries as follows: left wrist fracture with associated pain and discomfort; loss consciousness; left hand pain; left wrist pain; neck pain; tinnitus; back pain; sprained left collarbone with associated pain and discomfort; left collarbone

pain; bilateral leg pain; neck pain; bilateral knee pain; head pain; bilateral hip pain; chin pain; bilateral leg contusions; bilateral knee contusions; head contusion; bilateral hip contusions; bilateral leg lacerations; headaches; chin contusions; and anxiety. Additionally, Madison R. Conroy suffered pain, both mental and physical. Madison R. Conroy has been forced to incur substantial expenses for hospital and medical care, has been unable to work to her financial detriment, has been unable and remains unable to participate in and enjoy life's activities and has sustained a loss of earning capacity.

The accident occurred on Route 188 a/k/a Strongtown Road in Southbury, Connecticut at its intersection with Airport Road at approximately 7:27 p.m. on September 25, 2019. See attached Accident Information Summary.

Take notice that Madison R. Conroy intends to pursue a claim for money damages against you.

Dated at Middlebury, Connecticut, this 14th day of October, 2019.


BY _____
Garrett M. Moore, Sr.
For: Moore, O'Brien, & Foti
Her Attorneys

**NOTICE PURSUANT TO § 30-102 OF THE CONNECTICUT GENERAL
STATUTES OF INTENTION TO INSTITUTE A LAWSUIT AND CLAIM MONEY
DAMAGES**

**NOTICE GIVEN TO: Thomas Joseph Sobocinski d/b/a
Black Hog Brewing a/k/a Black Hog Brewing LLC**

Business Address: 115 Hurley Road, Building 9A
Oxford, CT 06478

Thomas Joseph Sobocinski

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New Haven, CT 06510

Business Address (3): 25 Brinsmade Road
Hamden, CT 06514

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New Haven, CT 06519

Residence Address (2): 25 Brinsmade Road
Hamden, CT 06514

Jason Sobocinski

Business Address: 115 Hurley Road, Building 9A
Oxford, CT 06478

Residence Address: 153 Dessa Drive
Hamden, CT 06517

Black Hog Brewing LLC: Backer

Business Address (1): 115 Hurley Road, Building 9A
Oxford, CT 06478

Mailing Address (2): 115 Hurley Road, Building 9A
Oxford, CT 06478

Agent for Service:

Thomas Joseph Sobocinski

Business Address (1): 115 Hurley Road, Building 9A
Oxford, CT 06478

Business Address (2): 93 Whitney Avenue
New Haven, CT 06510

Business Address (3): 25 Brinsmade Road
Hamden, CT 06514

Residence Address (1): 141 Greenwich Avenue
New Haven, CT 06519

Residence Address (2): 25 Brinsmade Road
Hamden, CT 06514

Thomas Joseph Sobocinski: Permittee

Business Address (1): 115 Hurley Road, Building 9A
Oxford, CT 06478

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New Haven, CT 06510

Business Address (3): 25 Brinsmade Road
Hamden, CT 06514

Residence Address (1): 141 Greenwich Avenue
New Haven, CT 06519

Residence Address (2): 25 Brinsmade Road
Hamden, CT 06514

Thomas Joseph Sobocinski: Limited Liability Member

Business Address (1): 115 Hurley Road, Building 9A
Oxford, CT 06478

Business Address (2): 93 Whitney Avenue
New Haven, CT 06510

Business Address (3): 25 Brinsmade Road
Hamden, CT 06514

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Tyler R Jones: Limited Liability Member

Business Address: 93 Whitney Avenue
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Residence Address: 51 Spring Road
North Haven, CT 06473

Kelly Ann Sobocinski: Limited Liability Member

Business Address: 93 Whitney Avenue
New Haven, CT 06510

Residence Address: 153 Dessa Drive
Hamden, CT 06517

**ON BEHALF OF: Lisa R. Conroy (Age 52)
 509 Shadduck Road
 Middlebury, CT 06762
 DOB: 11/28/1966**

PLEASE TAKE NOTICE THAT:

On or about September 25, 2019, you, your servants, agents, and/or employees, did for a valuable consideration, serve and/or furnish intoxicating liquors to John Arthur McDonald (DOB 10/13/1982), of 1111 Country Club Road in Middletown, Connecticut, while he was in an intoxicated state. Said sale of intoxicating liquors took place while John Arthur McDonald, was at Thomas Joseph Sobocinski d/b/a Black Hog Brewing a/k/a Black Hog Brewing LLC, 115 Hurley Road, Building 9A Oxford, CT 06478 between the hours of 8:00 a.m. and 7:27 p.m. on September 25, 2019. As a result of said intoxication and the sale of intoxicating liquors to John Arthur McDonald by you, your servants, agents, and/or employees on that date, the automobile John Arthur McDonald was operating failed to stop at a stop sign and suddenly and without warning entered the intersection and struck a motor vehicle Lisa R. Conroy was in causing her vehicle to be pushed several feet across oncoming lanes of traffic and into the woods, thereby causing Lisa R. Conroy to sustain and suffer injuries as follows: traumatic macular hole of the right eye with associated pain and discomfort; loss of consciousness; bilateral wrist pain, bilateral hand pain; left shoulder pain, bilateral arm pain; bilateral leg pain; headaches; back pain; neck pain; abdomen pain; bilateral knee pain; right foot pain; right eye pain; bilateral leg pain; facial pain; head pain; chest pain; bilateral hip pain; right hip

contusions; bilateral arm contusions; bilateral wrist contusions, bilateral hand contusions; bilateral wrist lacerations; contusions to right foot; lacerations to right foot; rib pain; bilateral knee contusions; bilateral knee lacerations; bilateral leg contusions; abdominal contusions; laceration to head; chest contusions; breast contusions; blurry vision; impaired vision; anxiety; and dizziness. Additionally, Lisa R. Conroy suffered pain, both mental and physical. Lisa R. Conroy has been forced to incur substantial expenses for hospital and medical care, has been unable to work to her financial detriment, has been unable and remains unable to participate in and enjoy life's activities and has sustained a loss of earning capacity.

The accident occurred on Route 188 a/k/a Strongtown Road in Southbury, Connecticut at its intersection with Airport Road at approximately 7:27 p.m. on September 25, 2019. See attached Accident Information Summary.

Take notice that Lisa R. Conroy intends to pursue a claim for money damages against you.

Dated at Middlebury, Connecticut, this 4th day of October, 2019.

BY 

Garrett M. Moore, Sr.
For: Moore, O'Brien, & Foti
Her Attorneys